

MAR 22 2016

A091 (Rev. 8/01) Criminal Complaint

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

BARAJAS v.

**Gonzalo BARAJAS
& Meliza TURRUBIARTES**

Carol BARAJAS

C-16-355m

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about 3/21/2016 in Jim Hogg County, in the
(Date)

Southern District of Texas defendant's **Gonzalo BARAJAS, Carol BARAJAS,
& Meliza TURRUBIARTES**

each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section 1324

I further state that I am a(n) Special Agent and that this complaint is based on the
Official Title following facts:

See Attached Affidavit of ICE Special Agent **Bryan Anderson**

Continued on the attached sheet and made a part of this complaint ☒ Yes ☐ No

[Signature]
Signature of Complainant

Bryan Anderson
Printed Name of Complainant

Sworn to before me and signed in my presence, and probable cause found

March 22, 2016
Date

Jason B. Libby U.S. Magistrate Judge
Name and Title of Judicial Officer

at Corpus Christi, Texas
City and State

[Signature]
Signature of Judicial Officer

MAR 22 2016

AFFIDAVIT

David J. Bradley, Clerk of Court

I, Bryan Anderson after being duly sworn, state as follows:

On March 21, 2016, at approximately 5:15 pm Border Patrol Agents working roving patrol duties near Hebbronville, Texas observed a gray impala bearing temporary tags 34F-5362 and a Ford F-350 bearing Texas license plates FCM-9773 traveling in tandem at a high rate of speed northbound on FM 1017. A short time later, another Border Patrol agent witnessed the vehicles still traveling in tandem on FM 1017 and began following the vehicles to conduct records checks on the license plates. Record checks conducted for the Ford F-350 revealed that the vehicle was reported stolen out of Harris County. Agents have learned that alien smuggling organizations often use stolen vehicles as load vehicles to transport illegal aliens.

At that time, the BP agent radioed for backup and attempted to conduct a vehicle stop of the F-350. Once the agent initiated his emergency equipment the driver of the F-350 immediately turned off of FM 1017 and crashed through a fence. The white F-350 continued driving through the brush northbound and then came to a complete stop. Approximately ten subjects jumped out of the interior of the pick-up truck and ran into the adjacent brush. Border Patrol agents were later able to apprehend a total of four individuals who absconded into the brush. The four individuals were identified as Jose ALFARO-Sibrian, Axel OROZCO-Vasquez, Kevin QUINTANILLA-Sibrian, and Arnold VELASQUEZ-Lopez. Immigration inspections revealed that all four were undocumented aliens (UDA) illegally present in the United States.

After the individuals absconded from the F-350, the driver of the vehicle continued driving through the brush and crashed through another fence in an attempt to evade capture. The driver then attempted to abscond from the vehicle and was apprehended by BP agents. The driver was identified as Gonzalo BARAJAS. During pursuit of the F-350, agents also observed the gray impala temporary tags 34F-5362 traveling back southbound on FM 1017. At that time, BP agents initiated a stop of the vehicle for suspicion of being involved in alien smuggling. The driver was identified as Meliza TURRUBIARTES and the front seat passenger was identified as Carol BARAJAS. At that time, Meliza TURRUBIARTES, Carol BARAJAS, Gonzalo BARAJAS and the four UDAs were placed under arrest and transported back to the station for questioning and processing.

Principal Statements:

Agents read Gonzalo BARAJAS his Miranda Rights in his preferred language of English. BARAJAS acknowledged he understood his rights and he was willing to speak with agents without an attorney present. BARAJAS admitted to agents that he was knowingly transporting UDAs and that he was going to be paid \$100 per alien. BARAJAS explained Meliza TURRUBIARTES and Carol BARAJAS, the women encountered in the gray impala, are his sisters. BARAJAS also admitted they both knew he was transporting UDAs and agreed to be his "checker". BARAJAS stated as "checkers" they would check the road to make sure it was clear of immigration.

Agents read Meliza TURRUBIARTES her Miranda Rights in her preferred language of English. TURRUBIARTES acknowledged she understood his rights and she was willing to speak with agents without and attorney present. TURRUBIARTES claimed she did not know anything about alien smuggling and stated her sister Carol BARAJAS picked her to take her to meet a guy in Hebbbronville, Texas she had met online.

Agents read Carol BARAJAS her Miranda Rights in her preferred language of English. BARAJAS acknowledged she understood his rights and indicated she was not willing to speak with agents without and attorney present. At that time, the interview was terminated.


Material Witness Statements:

Agents read Axel OROZCO-Vasquez his Miranda Rights in his preferred language of Spanish. OROZCO signed his rights indicating that he understood them and he stated that he willing to speak with Agents without an attorney present. OROZCO stated that he crossed into the US illegally on March 19 by wading across the Rio Grande River. OROZCO said he paid a total of \$7000 to be smuggled into the United States and that Houston, Texas was his final destination. OROZCO identified Gonzalo BARAJAS as the driver of the truck he was in when encountered by Border Patrol agents. OROZCO explained BARAJAS instructed them to "get up" and "get out" when agents attempted to stop the vehicle.

Agents read Kevin QUINTANILLA-Sibrian his Miranda Rights in his preferred language of Spanish. QUINTANILLA signed his rights indicating that he understood them and he stated that he willing to speak with Agents without an attorney present. QUINTANILLA stated that he crossed into the US illegally on March 19 by wading across the Rio Grande River. QUINTANILLA said he paid a total of \$6000 to be smuggled into the United States and that Virginia was his final destination. QUINTANILLA identified Gonzalo BARAJAS as the driver of the truck he was in when encountered by Border Patrol agents. QUINTANILLA explained that as BARAJAS was driving he kept looking back to see if they were being followed.

The other two apprehended UDAs were identified as juveniles. At that time agents terminated their interview. Kevin QUINTANILLA-Sibrian and Axel OROZCO-Vasquez will be held as material witnesses pending criminal proceedings.

The other two apprehended UDAs were identified as juveniles. At that time agents terminated their interview. Kevin QUINTANILLA-Sibrian and Axel OROZCO-Vasquez will be held as material witnesses pending criminal proceedings.


Special Agent Bryan Anderson
Homeland Security Investigations

SUBSCRIBED AND SWORN TO BEFORE ME this ²²23rd day of March, 2016.


Jason B. Libby U.S. Magistrate Judge